

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

*Defendants.*

Civil Action No. 2:23-CV-00379-JRG-RSP

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

*Defendants.*

Civil Action No. 2:23-CV-00377-JRG-RSP

**JOINT REPORT OF MEET AND CONFER REGARDING  
T-MOBILE'S MOTIONS TO COMPEL (DKT. NOS. 124, 126)**

Pursuant to Paragraph 9(c) of the Court's Discovery Order (Dkt. No. 43), Local Rules CV 7(h) and (i), and the Court's Standing Order Regarding "Meet and Confer" Obligations Relating to Discovery Disputes, Plaintiff Headwater Research, LLC ("Headwater") and Defendants T-Mobile USA, Inc. and Sprint Corp. (collectively, "T-Mobile" or "Defendants"), (collectively, the "Parties") respectfully file this Joint Report about the results of their lead/local meet and confer on the two motions set for hearing on February 5, 2025: T-Mobile's Motion to Compel Expert Reports, Transcripts, Exhibits, Written Discovery, and ESI (Dkt. No. 123) and T-Mobile's Motion to Compel Corporate Documents (Dkt. No. 126).

While the Parties discussed their respective positions, they were unable to resolve the matters set forth in their briefing on T-Mobile's Motions to Compel and presently remain at impasse on each motion. If there are any developments between now and the hearing date, the Parties will update the Court.

Dated: January 28, 2025

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for the parties conferred to discuss the substance of this Motion pursuant to Local Rule CV-7(h). Counsel for the parties agreed on the substance of this Motion and further agreed to jointly file this Motion.

/s/ Katherine Q. Dominguez  
Katherine Q. Dominguez

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 28th day of January 2025.

/s/ Katherine Q. Dominguez  
Katherine Q. Dominguez